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*Attorneys for Co-Lead Plaintiff Movants Dr. Vinod Sodha and
Dr. Amee Sodha and Proposed Lead Counsel for the Class*

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

PHILIP GOLUBOWSKI, Individually and on
Behalf of All Others Similarly Situated,

Plaintiff,

v.

ROBINHOOD MARKETS, INC., VLADIMIR
TENEV, JASON WARNICK, BAIJU BHATT,
JAN HAMMER, PAULA LOOP, JONATHAN
RUBENSTEIN, SCOTT SANDELL, ROBERT
ZOELLICK, GOLDMAN SACHS & CO. LLC,
J.P. MORGAN SECURITIES LLC,
BARCLAYS CAPITAL INC., WELLS FARGO
SECURITIES, LLC, MIZUHO SECURITIES
USA LLC, JMP SECURITIES LLC,
KEYBANC CAPITAL MARKETS INC.,
PIPER SANDLER & CO., ROSENBLATT
SECURITIES INC., BMO CAPITAL
MARKETS CORP., BTIG, LLC,
SANTANDER INVESTMENT SECURITIES
INC., ACADEMY SECURITIES, INC., LOOP
CAPITAL MARKETS LLC, SAMUEL A.
RAMIREZ & COMPANY, INC., and SIEBERT
WILLIAMS SHANK & CO., LLC,

Defendants.

Case No. 3:21-cv-09767-EMC

**DECLARATION OF THOMAS L.
LAUGHLIN, IV IN SUPPORT OF DR.
VINOD SODHA AND DR. AMEE
SODHA'S MOTION FOR: (1)
APPOINTMENT AS CO-LEAD
PLAINTIFFS; AND (2) APPROVAL OF
LEAD COUNSEL**

Judge: Hon. Edward M. Chen
Dept.: 5, 17th Floor
Date: March 24, 2022
Time: 1:30 p.m.

1 I, Thomas L. Laughlin, IV, pursuant to 28 U.S.C. §1746, declare as follows:

2 1. I am an attorney duly licensed to practice and have been approved by this Court to
3 practice in the above-captioned action *pro hac vice*. See ECF No. 9. I am an attorney with the law
4 firm of Scott+Scott Attorneys at Law LLP (“Scott+Scott”).

5 2. I make this declaration in support of the motion of Lead Plaintiff movants and
6 putative Class members Dr. Vinod Sodha and Dr. Amee Sodha (“Movants”) for an order:
7 (1) appointing Movants as Co-Lead Plaintiffs; and (2) approving the Movants’ selection of
8 Scott+Scott as Lead Counsel. I have personal knowledge of the matters stated herein, and if called
9 upon, I could, and would, competently testify thereto.

10 3. Attached are true and correct copies of the following:

11 Exhibit A: Notice published on December 17, 2021, pursuant to the Private
12 Securities Litigation Reform Act of 1995 (“PSLRA”) via
13 *GlobeNewswire*;

14 Exhibit B: Movants’ PSLRA Certifications;

15 Exhibit C: Joint Declaration of Movants;

16 Exhibit D: Movants’ loss charts; and

17 Exhibit E: Scott+Scott’s firm résumé.

18 I declare under penalty of perjury under the laws of the United States of America that the
19 foregoing is true and correct.

20 Executed this 15th day of February 2022, in New York, New York.

21 **SCOTT+SCOTT ATTORNEYS AT LAW LLP**

22 *s/ Thomas L. Laughlin, IV*
23 Thomas L. Laughlin, IV (admitted *pro hac vice*)

CERTIFICATE OF SERVICE

I hereby certify that on February 15, 2022, I caused the foregoing document to be filed with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the email addresses denoted on the Electronic Mail Notice List.

Executed on February 15, 2022, at New York, New York.

s/ Thomas L. Laughlin, IV

Thomas L. Laughlin, IV
(admitted *pro hac vice*)